

WILLIAM TURNER

# **Anti-bribery Policy**

June 2025

# 1. Introduction

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William Turner Ltd is committed to conducting business ethically, transparently, and in compliance with all relevant laws and regulations. We hold ourselves to the highest standards of integrity and professionalism, and we expect the same from all employees, business partners, and representatives.

This policy outlines our approach to preventing bribery, corruption, and anti-competitive practices. It applies to all employees, officers, directors, consultants, contractors, agents, intermediaries, and any other individuals or organisations acting on behalf of William Turner Ltd, globally.

# 2. Understanding Bribery and Corruption

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Bribery is offering, promising, giving, requesting, or accepting an undue advantage with the intent to influence business decisions or secure improper advantage. Corruption is the abuse of entrusted power for private gain and includes all forms of bribery.

Examples include:

- Cash payments or kickbacks
- Lavish gifts or excessive hospitality
- Unjustified rebates or discounts
- Hiring relatives or associates without merit

Bribery is illegal under the UK Bribery Act 2010, and penalties for violations include imprisonment (up to 10 years), unlimited fines, and severe reputational damage.

## 3. Policy Statement

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**William Turner Ltd strictly prohibits any form of bribery or corruption. Specifically, you must not:**

- Offer, give, solicit, or accept a bribe, whether directly or indirectly;
- Use facilitation payments to expedite services you are entitled to;
- Engage in improper reciprocal arrangements or “quid pro quo” agreements;
- Allow third parties acting on our behalf to engage in corrupt practices.

**This applies to interactions with:**

- Government officials and regulators
- Private sector organisations
- Customers, suppliers, and business partners

**Permitted conduct (with proper documentation):**

- Modest and proportionate hospitality and gifts
- Expedited service fees clearly disclosed and legally permissible
- Providing support or resources for legitimate business purposes

If uncertain about whether an action may violate this policy, seek guidance from the Managing Director before proceeding.

## 4. Risk Awareness and Mitigation

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**High-risk areas include:**

- Gifts and hospitality over £50: Must be reported to management immediately.
- Third-party relationships: Due diligence must be completed, and contracts must outline ethical expectations.
- Record keeping: Financial records must be accurate and transparent. No unrecorded transactions are permitted.

Managers are responsible for ensuring compliance and conducting periodic reviews of practices within their teams.

## 5. Anti-Competitive Behaviour

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William Turner Ltd complies with all applicable competition laws, including:

The Competition Act 1998

The Enterprise Act 2002

Articles 101 and 102 of the Treaty on the Functioning of the European Union (TFEU)

## Prohibited behaviour includes:

**Cartels:** Agreements to fix prices, restrict output, rig bids, or divide markets.

**Anti-competitive agreements:** Long-term exclusivity agreements, retail price maintenance, and restrictive IP licensing.

**Abuse of dominance:** Charging predatory prices, imposing unfair conditions, or refusing supply without justification.

Violations may result in fines of up to 10% of global turnover, director disqualification, and imprisonment.

For a full list, please speak with a Company Director.

## 6. Risk Management and Training

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- All staff must complete training on bribery and competition law compliance.
- The Company will conduct periodic risk assessments to identify areas vulnerable to bribery or anti-competitive conduct.
- Internal controls will be reviewed regularly, and staff feedback is encouraged to strengthen our policies.

## 7. Reporting Concerns

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Everyone at William Turner Ltd has a responsibility to report any suspected bribery, corruption, or anti-competitive activity. If you suspect wrongdoing:

- Report immediately to the Managing Director, Bruce Freeland.
- Reports will be treated confidentially and investigated promptly.
- Retaliation against whistleblowers will not be tolerated.

## 8. Monitoring and Enforcement

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Compliance with this policy is mandatory. Breaches may result in disciplinary action, up to and including dismissal, and legal action where appropriate. This policy will be reviewed annually to ensure it remains effective and aligned with legal and business changes.

Signed: .....

Position: Managing Director

Print Name: Bruce Freeland

Date of Issue: .....

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